

# Exhibit C

**From:** [Joachim, Jordan S](#)  
**To:** [Sahasrabudhe, Peter A.](#)  
**Cc:** [Russ III, Hugh M.](#); [Perry, Adam W.](#); [Quinn, Robert E.](#); [Claudia Wilner](#); [Anjana Malhotra](#); [Timmick, Andrew J.](#); [Freely, Cheyenne N.](#); [Chinyere Ezie](#)  
**Subject:** BLRR v. City of Buffalo - Lockwood deposition  
**Date:** Thursday, April 27, 2023 3:29:22 PM

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Peter,

As you know, we feel strongly that at least 14 hours are needed for former Commissioner Lockwood's deposition, since he is a central witness in this case, is a named defendant, and spent more than 14 years combined as deputy commissioner and commissioner. Given your opposition to extending the time of depositions, we intend to file a motion seeking leave to exceed the default 7 hours.

In an effort to resolve this without motion practice, however, we wanted to check whether you would be willing to agree to make former Commissioner Lockwood available for 14 hours for his deposition if we agreed to restrict the time of certain of the other upcoming depositions so that those depositions would be less than the default 7 hours. Please let us know if this is something you would be willing to consider, and we can provide a specific proposal (i.e., which witnesses and how much time we'd agree to forgo).

Thanks,  
Jordan

**Jordan Joachim**

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